

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

CHARLENE JANSON

Plaintiff

v.

REITHOFFER SHOWS, INC.

Defendant

Case No.: 1:19-CV-00079-SAG

PLAINTIFF'S ANSWERS TO INTERROGATORIES

Plaintiff, Charlene Janson, by and through her attorneys, Deborah L. Potter, Suzanne V. Burnett, and Potter Burnett Law, LLC, hereby answer Interrogatories propounded by the Defendant, Reithoffer Shows, Inc., in the above-captioned case, and states as follows:

(a) The information supplied in these Answers is based solely upon the knowledge of the executing party, representatives and attorney, unless privileged.

(b) The word usage and sentence structure is that of the attorney who in fact prepared these Answers and said language does not purport to be the exact language of the executing party.

INTERROGATORY NO. 1: State your full name, home address by date during the past ten years, date and place of birth, marital status, and social security number.

ANSWER: Charlene Mae Janson; Home Address: 3020 Maryland Avenue,

Baltimore, MD 21227; Date of Birth: May 8, 1964; Place of Birth: Baltimore,

Maryland; Marital Status: Married. Given today's climate of identity theft, Plaintiff

declines to provide her Social Security number.

INTERROGATORY NO. 2: Identify all your employers during the past ten years, the inclusive dates of your employment with each such employer, your duties for each such employer, and the reason for cessation of employment with each such employer.



ANSWER: Plaintiff is employed with MedStar Union Memorial Hospital as an administrative assistant since October 2006.

INTERROGATORY NO. 3: Give a complete statement of the facts as to how you contend the occurrence took place, including what you did during the period of time beginning six hours before the occurrence and continuing through the occurrence, including on what specifically you contend you caught your foot on that caused you to fall.

ANSWER: On the date of the occurrence, Plaintiff traveled from her home in Baltimore to Frederick, Maryland to attend the Great Frederick Fair with her family. She was accompanying her nephew on a kiddie ride known to Plaintiff as the "Space" ride. She asked the attendant if it was okay to ride the ride and was told yes. She walked up the ramp and onto the ride platform. She assisted her nephew into the ride, which appeared to be in the shape of a boat. She then attempted to get into the ride herself. She had her left foot/leg in the boat and as she attempted to finish boarding the boat, she fell.

Plaintiff contends the platform was too narrow for an adult; Plaintiff contends there were not adequate hand rails/assistive devices for an adult to board the ride; Plaintiff contends there was no warning about the dangers of an adult boarding the ride; Plaintiff contends there was no step to assist her onto the ride; Plaintiff contends the attendant should not have permitted her to board the ride; and Plaintiff contends the ride was set up in an unreasonably dangerous manner; Plaintiff refers Defendant to Plaintiff's Complaint wherein Plaintiff fully states all claims of negligence against Defendant.

INTERROGATORY NO. 4: Identify all persons whom you believe to be, or who claim to be, eyewitnesses to all or any part of the occurrence, stating the location of _____ the witness at the time of the occurrence.